

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:20CR00785
	:	
Plaintiff,	:	
	:	JUDGE CHRISTOPHER A. BOYKO
vs.	:	
	:	
RANDY S. DELANO,	:	<u>MOTION FOR LEAVE TO FILE</u>
	:	<u>SENTENCING MEMORANDUM</u>
Defendant.	:	<u>UNDER SEAL</u>

Defendant, through counsel moves the Court for leave to file his Sentencing Memorandum under seal pursuant to Rule 49.4 of the Local Criminal Rules. The reason for this request is that Mr. Delano's sentencing memorandum will contain personal and sensitive information which should not be disclosed to the public. Mr. Delano therefore requests that the Court issue an order allowing him to file his sentencing memorandum under seal.

For these reasons, Mr. Delano requests that the Court grant this motion.

Respectfully submitted,

STEPHEN C. NEWMAN
Federal Public Defender
Ohio Bar: 0051928

/s/Carolyn M. Kucharski
CAROLYN M. KUCHARSKI
Assistant Federal Public Defender
Ohio Bar: 0062119
1660 West Second Street, Suite 750
Cleveland, Ohio 44113
(216) 522-4856 Fax: (216) 522-4321
e-mail address: carolyn_kucharski@fd.org